



May 7, 2020

VIA ECF

The Honorable P. Kevin Castel, U.S.D.J.
Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Application approved nunc pro tunc to May 1,
2020 for up to 20 hours at \$110 per hour.
SO ORDERED.
5/7/2020

P. Kevin Castel
United States District Judge

Re: *United States v. Alex Rodriguez*, 1:15-cr-00778-PKC

Dear Judge Castel:

On May 1, 2020, I was appointed by this Court to represent Alex Rodriguez as CJA counsel in order to draft and file a motion for compassionate release on his behalf. Mr. Rodriguez is an inmate at FCI Lewisburg. I write to respectfully request that associate counsel be appointed to assist me in the matter. Specifically, I write to request that Fern Mechlowitz, a Senior Associate and full-time employee at my firm, be approved to work on this matter for more than 10 hours, at a rate of \$110 an hour, *nunc pro tunc* to the date of my appointment.

Due to the time-sensitive nature of the emergency motion, Ms. Mechlowitz has already spent more than 10 hours researching and drafting the reply memorandum of law on Mr. Rodriguez's motion, which we filed on Monday, May 4, 2020. She has also assisted me with a review of Mr. Rodriguez's lengthy medical history, which revealed multiple conditions that place him at high risk for life-threatening complications from COVID-19, including polycystic kidney disease, hypertension, asthma, sleep apnea, obesity, and gout. All of these had to be researched. She also communicated with Mr. Rodriguez and his family to gather his medical history.

I believe that Ms. Mechlowitz's assistance was, and continues to be, necessary to efficiently prepare an effective emergency motion and represent Mr. Rodriguez. Thank you for your consideration.

Respectfully submitted,

/s/ Kristen Santillo

Kristen Santillo